

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

IAN FREEMAN, ET AL.

Defendants.

No. 1:21-cr-00041-JL

**JOINT ASSENTED-TO MOTION TO CONTINUE TRIAL DATE**

On April 8, 2021, the Court held a complex case scheduling conference in this case. Prior to the hearing, the government presented defense counsel and the Court with a proposed trial schedule. Various defense counsel stated that they would be unable to commit to a trial date until after having had an opportunity to review discovery. The parties agreed that if all defendants assented, the government would file a motion to continue the trial date for six months and the Court would schedule a future status conference to impose a trial schedule after counsel have had an opportunity to review discovery. All defendants have assented.

The government therefore moves, with assent of all defense counsel, to continue the trial in this case for approximately six months. In addition, the government requests that the Court schedule a status conference in approximately three months at which time the parties will discuss a realistic trial date and related deadlines.

JOHN J. FARLEY  
Acting United States Attorney

Date: April 21, 2021

By:/s/ Georgiana L. MacDonald  
Georgiana L. MacDonald  
Assistant United States Attorney  
Bar Association #685375  
53 Pleasant St., 4th Floor  
Concord, NH 03301  
[Georgiana.MacDonald@usdoj.gov](mailto:Georgiana.MacDonald@usdoj.gov)

By:/s/ Seth R. Aframe  
Seth R. Aframe  
Assistant United States Attorney

By:/s/ John Kennedy  
John Kennedy  
Assistant United States Attorney